

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 19-1631 DHU
vs.)	
)	
KAMAL BHULA et. al.,)	
)	
Defendants.)	

MOTION TO COMPEL TESTIMONY
PURSUANT TO TITLE 18 U.S.C. §§ 6002-6003

The United States of America, hereby moves that the Court issue an Order pursuant to 18 U.S.C. §§ 6002-6003, compelling A.S. to give testimony or provide other information, which she refuses to give or provide on the basis of her privilege against self-incrimination, as to all matters about which she may be interrogated as a witness in the above-captioned case, and respectfully alleges as follows:

1. The United States wishes to call A.S. as a trial witness before a jury to testify about her own actions and her knowledge of the actions of others, including those of Kamal Bhula, Johnathan Craft, Eddie Hill, and Pragneshkumar Patel.
2. In the judgment of the undersigned, the testimony or other information from A.S. may be necessary to the public interest.
3. On the advice of counsel, A.S. has refused and is likely to continue to refuse to testify or provide other information on the basis of her privilege against self-incrimination.

4. Pursuant to 18 U.S.C § 6002, no testimony or other information compelled under the Order requested herein, or any information directly or indirectly derived from such testimony or information, may be used against the witness in any criminal case, except a prosecution for perjury, giving a false statement, or otherwise failing to comply with the Order. The prohibition against use of such testimony and information in any criminal case applies both to federal and to state criminal cases. *Murphy, et al., v. Waterfront Commission of New York*, 378 U.S. 52, 77-78 (1964).
5. This application is made with the approval of Deputy Assistant Attorney General Jennifer A.H. Hodge, U.S. Department of Justice Criminal Division, pursuant to the authority vested in her by 18 U.S.C. § 6003(b) and 28 C.F.R. § 0.175(a). A copy of the letter of authorization from Deputy Assistant Attorney General Jennifer A.H. Hodge is attached hereto.

Respectfully submitted,

ALEXANDER M.M. UBALLEZ
United States Attorney

Electronically filed April 24, 2023
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I HEREBY CERTIFY that I filed the foregoing
pleading electronically through the CM/ECF system
which caused the counsel of record to be
served by electronic means.

/s/

LETITIA CARROLL SIMMS

